AGRICULTURAL ANALYSIS

TM 5499 Rpl/ER 60-03-003

Prepared for

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SUMMARY OF FINDINGS

The project, when compared to against the appropriate Thresholds of Significance, will not have a significant impact to agriculture in San Diego County based upon the following findings.

- The project will not result in the conversion of Prime Agricultural Soils to a non-agricultural use.
- The project will not result in the conversion of Prime Farmland or Farmland of Statewide Importance.
- The project will not result in a conflict with agricultural zoning or use regulations.
- The project will not result in a conflict with a County Agricultural Preserve.
- The project will not result in a conflict with a land conservation contract.
- The density proposed by the project will not have an adverse significant impact on surrounding agricultural uses in terms of the introduction of residential uses into an agricultural area.
- This project, in conjunction with other existing and proposed projects, would have an impact to agriculture that is cumulative considerable pursuant to the State CEQA Guidelines.

I. INTRODUCTION

A. Overview of the Project:

This project proposes a 32 parcel Tentative Map (TM 5499 Rpl). The subject property has 48.31 acres. The residential parcels would range in size from 1.0 to 4.95 acres gross and net and the project will have a density of one dwelling unit per 1.6 acres. The property is located in the Central Pauma Valley Area (See Figure 1, Regional Location). More specifically, it is located .67 miles east of the intersection of Cole Grade Road and SR 76 (See Figure 2, Community Location).

The orange grove that will remain on the property after development will continue to be a producing grove, and will be maintained and managed by a separate cost center of the homeowner's association created solely for this purpose.

B. San Diego County General Plan and Zoning:

The property is within the Country Town and Environmentally Constrained Regional Plan Categories of the San Diego County Regional Land Use Element (See Figure 3, Regional Category). It is located in the Pala-Pauma Subregional Planning Area and has a plan designation of (1) Residential and (24) Impact Sensitive (See Figure 4, Community Plan Designation). The property is currently classified with the RR1 and A70 Use Regulation with a 1 and 4 acre minimum lot size respectively (See Figure 5, Zone Classifications).

C. Characteristics of the Subject Property:

The property generally slopes from the northwest to the south and southwest. Elevations range from to 890 to 754. The slope of the property is gentle until an approximately 25 to 30 foot drop located an average of about 1600 feet from Highway 76. Below this drop is the flood plain of the San Luis River. Further to the southwest there is a smaller berm with an average height of 5 to 10 feet. Below this berm is the floodway of the San Luis Rey River.

The northeastern portion of the property has been in Citrus for a number of years, while the rest of the area above the 25 to 30 foot drop was in dry grain at one time, but has since reverted to non-native grassland.

There is a single-family residence near the northwest boundary of the property which will remain after the subdivision of this parcel. This home will occupy Parcel 31.

D. Characteristics of the Surrounding Area

Land Use

The area to the northeast and northwest is generally larger lots with extensive agriculture. To the east are smaller areas of agriculture and the Pauma Valley Country Club Golf Course. To the southeast are a few areas of agriculture, but the area is dominated by the Pauma Valley Country Club Golf Course. To the south and south west is the flood plain and floodway of the San Luis Rey River, and beyond that are a few estate homes and some of the higher density residential areas of the Pauma Valley Country Club. With the exception of some isolated hills and the ridges going to the river, most of the surrounding area is under 25% slope.

Zoning and General Plan

Zoning:

In terms of the surrounding area, there is a wide variety of zones. The properties within the residential areas of the Pauma Valley Country Club are RS4 (Residential Single Family with a density of 4 dwellings per acre). The subject property as well as the adjacent property to the west and a small part of the property to the south is RR1 (Rural Residential with a density of 1 dwelling unit per acre) while the property across Highway 76 is A70 (Light Agricultural) with a 1 acre minimum parcel size. The remaining property in the vicinity is A70 with a 2 acre minimum parcel size.

General Plan:

This property is located within the Pala-Pauma Subregional Planning Area. In terms of the surrounding area, all of the property is located within the EDA Estate Development Area Regional Category. In terms of plan designations, property across Highway 76 as well as property once removed to the west is designated (19) Intensive Agriculture. The northern portion of the subject property and most of the adjacent property to the west and a small area to the southwest is designated (1) Residential. The area of the floodplain of the San Luis Rey River cuts through the area from east to west and has a designation of (24) Impact Sensitive. The area to the east of the subject property where it is not within the floodplain has a designation of (6) Residential with a density of 7.3 dwelling units per acre. To the southwest are several areas of (5) Residential which permits 4.3 dwelling units per acre. Finally to the extreme south is an area designated (2) Residential, which permits a density of 1 dwelling unit per acre.

E. Methods and Survey Limitations:

Study Area:

The study area includes the subject property to be developed, as well as all property within 1320 feet of the smallest rectangle encompassing the entire subject property (See Figure 6). The subject property comprises 48.31 acres of this area, while the remainder constitutes 351.69 acres for a total of 400 acres. Previous references to surrounding area refer to the same properties as the study area.

Method:

Agricultural uses and other land uses were determined through a combination of several sources. The primary source was a digitized aerial photo taken in February of 2005. This photo was enlarged 800% so that agricultural areas as well as the types of agriculture could be identified. This was supplemented by discussions with the owner and field reviews. Please note that the measurements taken from the aerial photo are two-dimensional and do not account for topography. Therefore there may be slight deviations in some of the acreage figures in rough terrain. However, this method was deemed sufficiently accurate for the broad conclusions desired in this analysis.

Agricultural Areas Impacted were determined by superimposing the areas in agricultural use over the Tentative Map and using a digital planimeter to measure pads, driveways, and streets. Cuts and fills for streets and pads and trails were also included in these measurements.

Soils information was determined through the San Diego County Important Farmland Map, produced by the California Department of Conservation, and the Soil Survey for the San Diego Area produced by the U.S. Department of Agriculture Soil Conservation Service.

Climatic Data was determined through use of the University of California Extension Service publication entitled Climates of San Diego County, Agricultural Relationships, as well as through use of the information provided in the above mentioned Soils Survey.

Limitations:

The method was limited by several factors. First, the latest available aerial photos were taken in February of 2005. Some new plantings could have occurred since then. While this was not a problem for the subject property, there may be some new plantings on other properties not obvious from the field survey.

Second, acreages were measured through the use of a digital planimeter. All measurements were taken 3 times and the results averaged, in accordance with accepted practice for this type of instrument. For the broad assumptions of this report, this level of precision is more than sufficient. However, it should be understood that the acreage figures are only close approximations.

Thresholds of Significance:

A determination as to the degree of significance of the impact, if any, of each of the following thresholds shall be made. The results of these determinations are to be considered guidelines that, when viewed as a whole in the context of each project, will determine whether a project has a significant impact to agricultural resources.

1. The project will result in the conversion of the following:

    a. Prime agricultural soils (i.e. an LLC rating I-II or soils rated as good in terms of fertility and suitability for the predominant crop in the vicinity).

    b. Prime Farmland, Farmland of Statewide Importance, or Unique Farmland as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

2. The Project will establish parcel sizes that cannot support future agricultural operations and are not consistent with other parcel sizes in the vicinity that currently support agriculture.

3. The project will result in a conflict with agricultural zoning or use regulations.

4. The project will result in a conflict with a County Agricultural Preserve.

5. The project will result in a conflict with a land conservation contract.

6. The density proposed by the project will have an adverse significant impact on surrounding agricultural uses in terms of the introduction of residential uses into an agricultural area.

7. This project, in conjunction with other existing and proposed projects, would have an impact to agriculture that is cumulative considerable pursuant to the State CEQA Guidelines.

II. SURVEY RESULTS

The following is the data generated through this survey with some preliminary analysis. Corresponding conclusions will be found in Section III.

A. County General Plan—Agricultural Designations:

The San Diego County General Plan has two designations devoted to agriculture. First is the (19) Intensive Agriculture designation, and second is the (20) General Agriculture designation. None of the subject property is within the (19) Intensive Agriculture Designation or the (20) General Agricultural Designation. However within the study area to the north across Highway 76 and along the western boundary of the study area there are about 122 acres with a Designation of (19) Intensive Agriculture. These areas are either separated by 900 feet to the west or by a major state highway to the north from the subject property.

B. County Agricultural Preserves:

There are no County Agricultural Preserves within the study area.

C. Land Conservation Contracts:

There are no parcels with Land Conservation Contracts within the study area.

D. Parcelization:

A review of parcelization within the study area indicates that there are 58 assessor's parcels are within the study area, not including assessor's parcels created for roadways. Of the 58 parcels, 23, or 40%, are in the classification of 1-2 acres or smaller, which is the range of parcels being proposed. These parcels are classified by size on Figure 7 and mapped on Figure 8.

The resulting minimum lot sizes would not be inconsistent with the lot sizes and character of the area.

E. Land Use:

In general terms, land uses in the study area are primarily agriculture or higher density residential uses. The study area consists of 400 acres, and agricultural uses occupy approximately 188 acres or 47.2% of the study area (See Figure 9). If the subject property is excluded, the study area has 351.69 acres, of which 176 acres or 50% is planted. 212 acres or 52.8% of the entire study area is currently not used for productive agriculture.

Figure 9 also shows that there is adjacent agriculture to the north, east, and west. The agriculture to the north is across Highway 76, which is a road that presently has a width of 80 feet. Additionally the parcels along Highway 76 have pads which range from 120 to 160 feet from the highway right of way for an average of 136 feet. Adding the highway width of 80 feet, no pad will be closer than 200 feet from this agriculture with an average distance of 216 feet. The agriculture to the west is a distance of 77 feet to the nearest pad with an average distance of 95.8 feet from the proposed pads of adjacent parcels. Finally, the agriculture to the east is a distance of 50 feet to the nearest pad with an average distance of 134.2 feet from the proposed pads of adjacent parcels. With these distances there should not be a conflict between the residential uses proposed and adjacent agricultural uses.

In terms of the subject property, 11.21 acres or 23.2% of the property is now in agriculture in the form of citrus.

Thus a little more than one-half of the surrounding area is presently devoted to agriculture, while a little less than one-fourth of the subject property is in a permanent agriculture.

F. Direct Impact to Existing Agriculture

There are currently 11.21 acres of citrus, which constitutes 23.2% of the property. This development will result in 4.83 acres of direct impacts to existing citrus (See Figure 10). This constitutes 43% of the citrus on site, and after development there will be 6.38 acres or 57% of the citrus remaining. Additionally, considering the entire property, after deducting open space easements and buffers, and development of the project, there will be 21.44 acres or 44% of the site available for agriculture.

A homeowner's association will be formed for various duties. One of these duties will be to hire a grove operator to maintain the agriculture which will remain after development. See Section "O" below for further discussion.

G. Soils

Soil Conservation Service:

The U.S. Department of Agriculture, Soil Conservation Service has prepared a Soil Survey for San Diego County. According to this survey there are six major soils types, making up approximately 97% of all the soil formations within the study area, (See Figure 11), and they are described below. There are also two soils types occupying minor amounts of acreage within the study area that have not been discussed:

VaB: Located in the central and southern portions of the study area, this Visalia Sandy Loam soil is on 2 to 5% slopes. It occupies approximately 166.2 acres or 47% of the study area. This soil formation is also located in the central and southern portions of the subject property, and occupies approximately 30.71 acres or 63.6% of the subject property. The fertility of this gently sloping soil is rated as "high," the runoff rate is slow, and the erosion hazard is slight. The Survey indicates that this soil is used for tomatoes, truck crops, avocados, citrus, flowers, walnuts, pasture and nursery stock. The Capability Rating for this soil is IIe-1 (19).

SsE: Located in the northern portion of the study area, this Soboba Stony Loamy Sand is on 9 to 30% slopes. It occupies approximately 95.24 acres or 27% of the study area. This soil formation is also located in the northern portion of the of the subject property, and occupies 7.25 acres or 15% of the subject property. The fertility of this alluvial fan soil is low. The runoff is medium to rapid, and the erosion hazard moderate to high. The Survey reports that this soil is used for avocados, orchards and range. The Capability Rating for this soil is VIe-7 (20); Sandy range site.

TuB: Located in the central portion of the study area, this Tujunga Sand is located on 0 to 5% slopes. It occupies approximately 36.25 acres, or 10.39% of the study area. This soil formation is also found in the southwestern portion of the subject property, and comprises 3.74 acres or 7.7% of the subject property. The fertility of this alluvial fan/flood plain soil is low. The runoff is slow to very slow, and the erosion hazard is slight. The Survey indicates that this soil is used mainly for range and golf courses, with small areas used for avocados, flowers and truck crops. The Capability Rating for this soil is IVs-4 (19); Sandy range site.

C1G2: Located in the southwest corner of the study area, this Cieneba Sandy Loam soil is found eroded on 30 to 65% slopes. It occupies approximately 21.05 acres or 6% of the study area. This soil type is not found on the subject property. This soil is steep to very steep. The runoff is rapid to very rapid, and the erosion hazard is high to very high. The Survey reports that this soil is used mainly for range, wildlife habitat, and watershed—with small areas used for avocados. The Capability Rating for this soil is VIIe-1 (19); Shallow Loamy range site.

VsG: Located in a strip running through the central portion of the study area, this Vista Coarse Sandy Loam soil is on 30 to 65% slopes. It occupies 10.14 acres, or 2.8% of the study area. This soil formation is also found in a strip running through the central portion of the subject property, and comprises 4.4 acres or approximately 9% of the subject property. This soil is steep to very steep over weathered rock. The runoff is rapid to very rapid, and the erosion hazard is high to very high. The Survey indicates that this soil is used mainly for avocados and range. The Capability Rating for this soil is VIIe-1 (19); Loamy range site.

RaC: Located in the east-central portion of the study area, this Ramona Sandy Loam soil is found on 5 to 9% slopes. It occupies approximately 10.44 acres, or 3% of the study area. This soil formation is also found in the southwestern portion of the subject property, and comprises 2.16 acres or 4.4% of the subject property. This soil has medium fertility. The runoff is slow to medium, and the erosion hazard is slight to moderate. The Survey reports that this soil is used for dry-farmed crops, irrigated orchards, citrus, truck crops, tomatoes, flowers, pasture, range, and housing developments. The Capability Rating for this soil is IIIe-1 (19); Loamy range site.

Five of the soils reviewed are found on the subject property. One of the soils types is rated as good for all types of crops reviewed except for tomatoes, one other is rated as good for two of the crops reviewed, and the three others are rated as good for one of the crops reviewed. Two of the soils are rated as unsuitable for any crop other than avocados. In this area the predominant crop is Citrus. Only one soil is rated as good for this crop, but this soil occupies 63.6% of the subject property. Thus in terms of term of the Soil Conservation Service Survey, one soil, which occupies a majority of the property, is above average in its suitability for agriculture while the others are generally average to below average.

In terms of fertility, one of the 5 soils is rated as high, while one other is rated as medium, 2 as low, and one other that was not rated. Thus as to the fertility of the soils on the subject property, one soil, occupying 63.6% of the subject property, would generally be considered above average while the others average.

In conclusion, the soils on the subject property taken as a whole are generally suitable for agriculture.

H. Soil Candidate Listing for Prime Farmland:

The VaB soil formation is a candidate soil listed for Prime Farmland and is found within the study area and also on the subject property. This soil occupies 166.2 acres or 49% of the study area and 30.71 acres or 63.6% of the subject property.

Of the 30.71 acres of VaB soils on the site, 3.1 acres or 10.1% is currently in agriculture, and of this 3.1 acres, 1.39 acres of will be directly impacted.

In terms of total impacts to the VaB soil type, whether or not there is agriculture on the property, 10.82 acres of the 30.71 acres of VaB will be directly impacted by this development or 35.2%. Thus 19.89 acres or 64.8% of this soil will be available for agriculture after the development. This is over 6 times the amount of this soil that is currently being used for agriculture.

I. Important Farmlands:

The California Department of conservation has classified land in California into seven “Important Farmlands Categories.” Annotated definitions of the relevant classifications are found below.

Prime Farmland: Land with the best combination of physical and chemical characteristics able to sustain long-term production of agricultural crops.

Farmland of Statewide Importance: Land with a good combination of physical and chemical characteristics for agricultural production, having only minor shortcomings, such as less ability to store soil moisture, compared to prime farmland.

Unique Farmland: Land used for production of the state’s major crops on soils not qualifying for prime or statewide importance. This land is usually

irrigated, but may include nonirrigated fruits and vegetables as found in some climatic zones in California.

Farmland of Local Importance: Land that meets all the characteristics of prime and statewide, with the exception of irrigation.

Urban and Built-up Land: Residential land with a density of at least six units per ten-acre parcel, as well as land used for industrial and commercial purposes, golf courses, landfills, airports, sewage treatment, and water control structures.

Other Land: Land which does not meet the criteria of any other category.

There are also Categories of Grazing Land, Other Land, and Water that have not been defined.

Figure 12 indicates that only 3 Important Farmland Categories are found on the subject property. The darker green represents Farmland of Statewide importance, green represents Unique Farmland, and yellow represents Farmlands of Local Importance. These categories are also located in the study area, along with the 3 other categories outlined below. These categories are discussed below in greater detail as they relate to the study area and subject property.

Prime Farmland:

55.72 acres or 28.5% of the study area is in the Prime Farmland Category. This category is located in the eastern portion of the study area. None of the subject property lies within this category.

Farmland of Statewide Importance:

12.09 acres or 3.44% of the study area is in the Farmland of Statewide Importance Category. This category is located in the central eastern portion of the study area. 4.39 acre or 9% of the subject property lies within this category.

Unique Farmland:

100 acres or 28.5% of the study area is in the Unique Farmland Category. This category is located in the northern quadrant of the study area. 6.66 acres or 13.7% of the subject property lies within this category.

Farmland of Local Importance:

45.64 acres or 13% of the study area is in the Farmlands of Local Importance Category. This category is also found in the center and western portion of the study area. 36.91 acres or 77% of the subject property is within this category.

Urban:

112.5 acres or 32% of the study area is in the Urban Category. This category is located in the southern portion of the study. None of the subject property lies within this category.

Other Land:

25.3 acres or 7.21% of the study area is in the Other Land Category. This Category is found in the central portion of the study area. This type of land is not located on the subject property.

The Important Farmlands Categories of Prime, Statewide Importance, and Unique are the most important classifications. Prime Farmlands are not found on the subject property, and only 11.05 acres or 23% is occupied by Unique Farmlands or Farmlands of Statewide Importance, of which 1.81 acres of Farmland of Statewide Importance and 2.77 acres of Unique Farmland are directly being impacted. This will leave 58.6% of these soils available for future agriculture. The remainder of the subject property is categorized as Farmland of Local Importance.

Thus, the suitability of the subject property for agriculture in terms of the Important Farmlands Classifications would fall in the medium range.

J. Micro Climate:

Information for Micro Climates in San Diego County is contained in the Climates of San Diego County Agricultural Relationships, published by the University of California Agricultural Extension Service. At the time of the publication of this document, the nearest Weather Reporting Station to the Subject Property was Valley Center 3N.

While the closest Weather Station to the subject Property is the Valley Center 3N station, a complete record is not available for this Station. The next closest Weather Station is the Escondido Weather Station.

Information not available for the Valley Center Station will be supplemented by the information provided by the Escondido station.

The Escondido Weather Station indicates an annual average maximum mean temperature of 76.2 degrees with an extreme high of 108 degrees and an extreme low of 17 degrees. The Valley Center Station reports an average rainfall of 16.09" with 11.47" coming during the months of December, January, February and March. The estimated date of the first freeze from the Valley Center Weather Station was December 1st and the last estimated freeze is April 1st.

Thus, the mildness of the microclimate of this area would be advantageous to the growing of semi-tropical crops.

K. Facilities:

Water is available from the Rancho Pauma Mutual Water Company, and there is water available for agricultural as well as residential purposes.

This district is dependant upon ground water, and has had, between the years 1998 to 2005 an average annual production of 2789 acre feet. The chart below indicates the amount of water being used for the current agriculture and the one home on the property, and the water usage after the development of this project. The acre-feet of water for citrus was taken from the San Diego County publication entitled Guidelines for Determining Significance--Agricultural Resources. The .5 acre feet per year for a residence came from the Hydrogeologic Report done for this project by Kennedy-Jenks and submitted on September 6, 2006.

Club Estates Water Usage
TM 5499

	Citrus	Acre Ft/Acre for Citrus	Houses	Acre Ft/House	Total Acre Ft
Current	11.21	3.0	1	0.5	34.13
Proposed	6.38	3.0	31	0.5	34.64
Difference					.51

The result was that the current citrus and one home uses 34.13 acre feet of water per year, and after the development there will be a usage of 33.71 acre feet or .51 acre feet per year more than is currently being used. This .51 acre feet represents .0183% of the average annual production of water by this district or roughly the equivalent of building one additional homes within the district.

Additionally, the well on the property will be turned over to the water district. This well was tested in 1991. There were 3 separate tests done which yielded an average flow of .119 acre feet per 24 hour period

Thus the will essentially be no impact on the District's capability to provide water, and gaining a high production well will enhance the District's ability to provide water to its members and the subject property.

Finally, water quality for agricultural purposes is generally a function of Total Dissolved Solids (TDS). The Hydrogeologic Study by Kennedy-Jenks references a study done on the water quality on the subject property in 2004. In the two tests taken, TDS was 420 and 480. This is below the general standard of 500 and thus the TDS for water quality and would indicate that water on the property is suitable for agriculture.

L. San Diego County Agricultural Production:

Citrus:

The County of San Diego County Department of Agriculture, Weights and Measures produces an annual report regarding Crop Statistics for San Diego County. According to the 2005 report, there are 13,803 acres planted with citrus in San Diego County, which is a decrease of 380 acres over the 2004 totals.

This proposal will directly impact 4.83 acres of the County's citrus plantings. This amounts to .035% of the acreage of citrus.

The acreage planted in citrus has been steadily declining in San Diego County for a number of years. In the 1996 Crop Statistics Report there were 17,116 acres of citrus planted and that amount has decreased to the amount reported in the 2005 Report of 13,803 acres. However, during that time period, the total acreage devoted to agriculture in San Diego County has increased from 169,618 acres to 273,176 acres. Thus the decrease in citrus acreage does not indicate an overall decline in agriculture in San Diego County, but more of a modification of the way cropland is used.

Thus this proposal will not result in a significant decrease to the total County agricultural production of citrus or a significant impact to San Diego County Agricultural Production.

M. Pesticides:

Pesticide users are required to register with the County and keep pesticides confined to the property on which they are being used with no significant drift.

The drift of pesticides can be harmful for adjacent agricultural uses as well as residential uses. Pesticides that drift onto adjacent crops can then show up in the fruit of that crop. If the adjacent owner has not registered for using that pesticide, that owner could be cited for a pesticide violation and the crop lost. Additionally the drift could bring a pesticide in contact with a plant that could be harmed by the pesticide.

Thus it is important that a pesticide user confines the substance to his property and uses them responsibly, whether it is used for agriculture or residences.

As stated above, pesticide users are now required to confine their pesticides to their property and not produce any significant drift. Additionally all buyers are required to be notified in writing and to acknowledge by signature that there may be agricultural uses nearby that may expose the buyer to irritations and inconvenience. (See "N" below.)

Thus the subject property will not result in a conflict between pesticide use and future residents

N. Property Disclosure Ordinance:

The San Diego County Board of Supervisors, on February 12, 2003, amended the San Diego County Code of Regulatory Ordinances to require purchasers to be notified in writing that agricultural uses may exist near to property that the buyer is purchasing. The buyer must acknowledge by signature that such agricultural uses are likely to be nearby that may expose the buyer to certain irritations and inconveniences.

Thus anyone purchasing a parcel of this development must be notified of the near agricultural uses and the potential for irritations and inconveniences.

O. Maintenance of the Orange Grove after Project Development

The orange grove that currently exists on the property is considered to be a design feature and an asset to the proposed property. The grove currently occupies 11.21 acres, and 4.83 acres will be directly impacted through pads and driveways. Where possible, trees that were removed during construction will be replaced. This leaves a minimum of 6.38 acres or 57% of the grove remaining after development. The management and maintenance of the grove will be the responsibility of the homeowner's association which will have a special cost center that will affect only the grove lots (lots 1-6, 20-23, and 30).

The grove lots will be responsible for all of the liabilities associated with the grove and enjoy the benefit of income derived from fruit sales. The Rancho Pauma

Mutual Water Company has agreed to provide water from a single meter at a very competitive rate, and based upon current operating costs, it is believed that the income, even with the reduced acreage, will exceed costs. Thus the grove will continue to be economically viable for the grove lots as well as an amenity for the entire community.

III. CUMULATIVE IMPACT

Section 15130(a) of the State CEQA Guidelines states that cumulative impacts of a project should be discussed when the project impacts, even though individually limited, are cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The following questions are listed in the CEQA Guidelines, Appendix G and are to be considered in evaluating cumulative agricultural impacts. The first three questions have been previously addressed in this report, while the last question will be addressed in detail in this Section.

1. *Would the project convert prime farmland, unique farmland, or farmland of statewide importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California resources Agency, to nonagricultural use?*

   None of the areas being directly impacted are classified as Prime Farmland. There are a total of 11.05 acres or 22.9% of the subject property classified as Farmlands of Statewide Importance or Unique Farmlands. Of these, only 1.98 acres of Farmland of Statewide Importance and 2.85 acres of Unique Farmland are directly being impacted. This will leave 58% of these soils available for future agriculture. Thus while there are 4.83 acres of these soils directly impacted, the fact that a majority of these soils will remain available for future agriculture would not constitute a cumulatively considerable impact.

2. *Would the project conflict with existing zoning for agricultural use or a Williamson Act Contract?*

   There is an agricultural use regulation on the subject property, as well as the surrounding property. However, this use regulation is not an exclusive agriculture zone, and permits a variety of uses. There is no use proposed for the project that would not be permitted in the agricultural zones currently applicable to the subject property or those properties surrounding it.

   There are no Williamson Act Contracts on the subject property or within the study area.

   Thus the determination is the project will not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

3. *Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland to nonagricultural use?*

The conclusion of this analysis is that the project will not involve other changes in the existing environment, which, due to their location or nature, result in the conversion of farmland to nonagricultural use.

This conclusion is based upon the following points.

a. *6 of the building pads will have agriculture to the north across a state highway. However the minimum distance from a pad to this agriculture will be 200 feet and the average distance of the building pads will be 216 feet. There will be 6 building pads adjacent to agriculture to the west. In this case the minimum distance from a building pad to agriculture will be 86 feet with the average distance of these building pads being 95.8 feet. Finally there will be 5 building pads adjacent to agriculture to the east. In this case the minimum distance from a building pad to agriculture will be 50 feet with the average distance of these building pads being 134.2 feet. Thus there will be ample separation of the development on this property with the nearest agricultural use.*

b. *Agriculture will remain on the property. There is a minimum of 6.38 acres of the oranges that will remain after development. The management and maintenance of the grove will be the responsibility of the homeowner's association which will have a special cost center for the grove lots (lots 1-6, 20-23, and 30) that will be responsible for all of the liabilities associated with the grove and enjoy the benefit of income derived from fruit sales. Based upon current operating costs, it is believed that the income, even with the reduced acreage, will exceed costs and the grove will continue to be economically viable.*

Thus 8 of the pads closest to adjacent agriculture will already have agricultural operations themselves.

c. Some of the surrounding area has already developed into estate sized residential lots or smaller. A review of the parcelization in the study area indicates that there are 23 of 58 parcels in the study area that are within the same acre range as what is being proposed. Thus the environment that exists will not be changed through the development of this parcel.

d. The General Plan Category for the subject property as well as land to both the east and west of the subject property is shown as "County Town". Additionally, the General Plan Designation of the property to the west permits one acre densities when the average slope is under 15% (which it appears to be)and the General Plan Designation on the properties to the east permit a density of 7.3 dwelling units per acre. Thus even though these properties have not developed to date at these densities, it is the plan of San Diego County that there be urban or semi-urban densities in the future on both the east and west of the subject property.

d. The San Diego County Board of Supervisors, on February 12, 2003, amended the San Diego County Code of Regulatory Ordinances to require purchasers to be notified in writing that agricultural uses may exist nearby on property that the buyer is purchasing. The buyer must acknowledge by signature that such agricultural uses are likely to be nearby that may expose the buyer to certain irritations and inconveniences.

Thus due to the distances of the building pads from adjacent agricultural land, the number of existing parcels already in the size range of those proposed, and the requirement that each perspective owner must sign a statement that they are aware of new agricultural operations, it is the conclusion that there will be no other changes to the environment that would result in the conversion of farmland to non-agricultural use.

4. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

As a part of the agricultural analysis, a study was done to determine if this project, combined with other projects in the vicinity, would have an impact that is cumulatively considerable. This was determined by reviewing projects that have been recently approved or are contemplated to be

approved in the near future, and adding the results to the impacts of the subject property.

A. Methodology:

An area was chosen that would function as a cumulative study area. The boundaries of this area were established by reviewing features of the landscape, which may isolate agricultural in this vicinity from other agricultural areas in the county. These landscape features were primarily major areas of steep slope that would separate agricultural areas, major areas where no agricultural activity was taking place, and areas that had had substantial urban development.

The cumulative study area was superimposed on the San Diego County GIS Discretionary Permit Map. This map indicates Major and Minor Subdivisions, Major Use Permits, General Plan Amendments (GPA's), and Plan Amendment Authorizations (PAA's) both requested and approved since approximately January of 1999. Major Use Permits for cellular antenna sites were not included due to the very small area that is affected with these projects. This results in a gross number of projects of any type in the study area. In this way the selected projects could be identified that had been approved and were contemplated over the last 7.5 years.

A map of the cumulative study area was overlain with the County Vegetation Map to determine which of the selected projects identified in the study area occurred on lands used for agriculture. To make this determination, any project occurring on vegetation classified as agriculture or developed and disturbed land was considered. Disturbed and developed land was considered because the land may have originally been in agriculture, with the developed classification being a result of the selected projects. Since the GIS Map only used points to identify projects, any projects even remotely close to agriculture or urban vegetation types was considered.

The next step was to identify those approved and proposed projects that are occurring on land currently used for agriculture that have or would have an effect on principal farmlands within the cumulative study area. (For purposes of this study, the term "principal farmlands" refers to the land referenced in question one of the CEQA Guidelines, reproduced on the first page of this Section. These lands would include Prime Agricultural Lands, Agricultural Lands of Statewide Importance, and Unique Farmlands per the California Department Important Farmlands Map 2002). This was done by overlaying the cumulative study area with the appropriate portions of the important farmlands map. Projects not within a principal farmland were also eliminated from consideration. As

above, the GIS Map only used points to identify projects, and selected projects even remotely close to principal farmlands were considered.

The plot plans and maps for those projects meeting both of the above tests were then obtained from the County Project Processing Counter (For purposes of this study, this last grouping of projects will be termed "Selected Projects"). The maps were then superimposed on the vegetation and farmlands maps to determine the principal farmlands in agriculture that were affected. The effects to the subject property could then be added to the approved and proposed agriculture lands affected through selected projects. This could be compared with the land in agriculture for the County as a whole. In this way a determination could be made if the cumulative impact of the selected projects in the cumulative study area was having a cumulatively considerable impact to agriculture in San Diego County as a whole.

The data within this report was based upon the County GIS Discretionary Permit Map dated August 2006. It is understood that prior to the public hearing, the discretionary permits will be reviewed in light of updated maps. At that point, it will be decided if there are changes that warrant disclosure to the decision making body.

B. The Cumulative Analysis:

The subject property is located in the central part of the Pala-Pauma Community Planning Area. The cumulative study area was established, which encompasses much of the valley and slope areas of the San Luis Rey River Valley. It is some 6160 acres in size and is shown on Figure 13.

The County General Plan shows regional categories of Estate Development (EDA) and Country Town (CT) over a large majority of the area. It also includes a small area of Environmentally Constrained Area (ECA) where there is a County Agricultural Preserves. The General Plan Designation for this area is a combination of various designations including (17) Estate Residential and (18) Multiple Rural Use. There are also designations of (19) Intensive Agriculture, (20) General Agriculture over the County Agricultural Preserves and (24) Impact Sensitive over the San Luis Rey Flood Plain. Finally there are areas of urban densities within Country Town.

About 59% of the cumulative study area is used for agriculture, or roughly 3639 acres. There are also large areas scattered throughout the cumulative study area that are vacant. Agriculture in this area is primarily citrus, with and small areas of intensive truck farming and nursery stock.

The prices for citrus products have been flat for the last 10 years. There is now competition from Australia and also parts of Mexico. In addition, historically one of the largest markets has been Hong Kong, which is now making its citrus purchases from mainland China. As a result, many citrus operations now have a negative cash flow and are being removed or are no longer maintained. There are virtually no new plantings of citrus on a large scale.

Climate in this region is similar to the inland San Diego County with slightly more rainfall and more extremes in climate than the coastal area. However, the climate is still very mild and the mild nature is an important factor for the agriculture that exists in the cumulative study area.

About 3,643 acres, or 59% of the soils in the cumulative study area are classified as principal farmlands. Generally the quality of soils in this area vary from fair to good, with the better soils found in the San Luis Rey Valley. As indicated in the previous paragraph, climate plays a more important role in the agricultural development of this area than the soils.

Water is currently provided through individual wells or by the Rancho Pauma Mutual Water District, and water is available for agriculture.

In summary, about 59% of the cumulative study area is in some sort of agriculture, and both the zoning and the current general plan reflect this use. The agriculture is primarily citrus, and the pricing trends and market for this fruit may cloud the future agricultural use of this area.

After reviewing subdivisions that met the criteria described under "Methodology," it was determined that 5 selected projects, including the subject property, were occurring on lands that were being used for agriculture and were on a principal farmland as previously defined. Appendix A has a listing of the initial group of subdivisions, those in agricultural or urban vegetation types, and those having one of the three Farmlands classifications. The selected projects affect ~~169.24~~ 169.49 acres of the Principal Farmlands and are listed with acreages in Appendix B. Figure 13 indicates the location of the selected projects.

C. Agriculture in San Diego County:

According to the Department of Conservation, the following acreages of principal farmlands in San Diego County existed as of 2004:

Prime Farmland	8,525
Farmland of Statewide Importance	12,181
Unique Farmland	55,566
Total	76,272

This represents a reduction of 4101 acres or 5.1% in principal farmlands between 2002 and 2004. However, the 2005 Crop Statistics and Annual Report of the County of San Diego Department of Weights and Measures (the latest statistics available) indicate that within the period from 2004 to 2005 there was an increase of 6,742 acres in agricultural lands. Thus while there was a decrease in the principal farmlands, the County is experiencing an increase in overall agricultural acreage.

D. Summary

In terms of a cumulative effect to the cumulative study area, the subject property will not have any such effects. The lot sizes as proposed under TM 5499 are consistent with other lots in the cumulative study area. Additionally, after pads, driveways, roads and biological open space easements are subtracted, there will still be 44% of this property available for future agriculture uses.

In terms of the principal farmlands found in the cumulative study area, the 5 selected projects meeting the parameters of this study described above will impact 4.65% of the principal farmlands found in the cumulative study area.

Additionally, In terms of cumulative effect to San Diego County, the 5 selected projects meeting the parameters of this study amounts to a cumulative total of 169.49 acres. This amounts to a total of .22% of the Principal Farmlands in San Diego County.

As mentioned above, the proposed project will allow for the future use of approximately 44 percent of the subject property for agricultural activities. With this maintenance of land for agricultural use, as well as the increase in overall agricultural acreage in San Diego County of 6,742 acres from 2004 to 2005, the project will not result in a cumulative impact to agricultural acreage within the region.

IV. ANALYSIS OF IMPACTS

It has been determined that due to the characteristics of the subject property as well as the surrounding area, there will not be a significant impact to agricultural resources as a result of the implementation of this project. This is based upon an assessment of the threshold standards established in Section I.

Thresholds of Significance:

1. The project will result in the conversion of the following:

    a. Prime agricultural soils (i.e. an LLC rating I-II or soils rated as good in terms of fertility and suitability for the predominant crop in the vicinity).

    The VaB soil has a LLC rating of II and is rated as high in fertility. All other soils have a LLC rating higher than II and are rated as medium, low or unrated in terms of fertility.

    In terms of suitability for predominant crops in the vicinity, the predominant crops would be citrus. The VaB soil is rated as good for citrus, while one soil is rated as fair, and all others are rated as unsuitable.

    A small amount (3.1 acres or 10.1%) of the VaB soil is currently being used for agriculture, and of that amount, 1.39 acres is being directly impacted by this development. Thus only 4.5% of the VaB soil being used for agriculture will be impacted by this development.

    Additionally, if the non-agricultural VaB soils area is included, there are 10.82 acres or 35.2% of the 30.71 acres that will be directly impacted, leaving 19.89 acres or 64.8% of this soil available for future agriculture.

    b. Prime Farmland, Farmland of Statewide Importance, or Unique Farmland as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

    None of the areas being directly impacted are classified as Prime Farmland. There are a total of 11.05 acres or 22.9% of the subject property classified as Farmlands of Statewide Importance or Unique Farmlands. Of these, 1.98 acres of Farmland of Statewide Importance

and 2.85 acres of Unique Farmland are directly being impacted. This will leave 58.3% of these soils available for future agriculture.

Considering the small amount of the prime soil currently being used for agriculture, the small amounts of soils of statewide importance and unique soils, only one soil being rated as high in fertility and suitable for the predominant crop, and that 64.8% of the prime soil and 58.3% of the Unique Farmland and Farmland of Statewide Importance will remain available for future agricultural uses, it has been determined that this threshold has not been exceeded.

2. The Project will establish parcel sizes that cannot support future agricultural operations and are not consistent with other parcel sizes in the vicinity that currently support agriculture.

   The density requested would result in an average parcel size of 1.6 acres. It has been stated by the San Diego County Department of Agriculture, Weights, and Measures that there are over 600 citrus farms in San Diego County under 2 acres in size, and it can be presumed that parcels of the size proposed for the subject property would be able to support agriculture.

   Additionally, the surrounding area has already partially developed into estate sized residential lots. A review of the parcelization in the study area indicates that there are 23 parcels that are within the 1-2 acre range. Thus the parcels proposed would not be inconsistent with the parcelization in the area.
   Finally agriculture will remain on the property. There is a minimum of 6.38 acres or 57% of the oranges that will remain after development. The management and maintenance of the grove will be the responsibility of the homeowner's association, which will have a special cost center for the grove lots (lots 1-6, 20-23, and 30) that will be responsible for all of the liabilities associated with the grove and enjoy the benefit of income derived from fruit sales. Based upon current operating costs, it is believed that the income, even with the reduced acreage, will exceed costs and the grove will continue to be economically viable.

   Therefore this threshold has not been exceeded. The parcels that would be permitted by this project would be capable of supporting agriculture and will be jointly responsible for the operation and maintenance of the grove..

3. The project will result in a conflict with agricultural zoning or use regulations.

There is an agricultural use regulation on the subject property as well the surrounding property. However, this use regulation is not an exclusive agriculture zone, and permits a variety of other uses. There is no use proposed for the project that would not be permitted in the agricultural zones currently applicable to the subject property of those properties surrounding it. Thus the determination is that this threshold has not been exceeded and the project will not result in significant impacts in terms of conflicts with agricultural zoning.

4. The project will result in a conflict with a County Agricultural Preserve.

   There are no County Agricultural Preserves within the study area.

5. The project will result in a conflict with a land conservation contract.

   There are no land conservation contracts within the study area.

6. The density proposed by the project will have an adverse significant impact on surrounding agricultural uses in terms of the introduction of residential uses into an agricultural area.

   This threshold has not been exceeded based upon the following points.

   a. *The surrounding area has already partially developed into estate sized residential lots. A review of the parcelization in the study area indicates that there are 23 parcels in the study area (within 1320 feet of the perimeter of the subject property) that are within the 1-2 acre range. Thus the environment that exists, one of a mixture of agricultural uses and estate residential uses, will not be changed through the development of this parcel.*

   b. *Agriculture will remain on the property. There is a minimum of 6.38 acres or 57% of the oranges that will remain after development. The management and maintenance of the grove will be the responsibility of the homeowner's association which will have a special cost center for the grove lots (lots 1-6, 20-23, and 30) that will be responsible for all of the liabilities associated with the grove and enjoy the benefit of income derived from fruit sales. Based upon current operating costs, it is believed that the income, even with the reduced acreage, will exceed costs and the grove will continue to be economically viable.*

Thus 8 of the pads closest to adjacent agriculture will already have agricultural operations themselves.

c. *6 of the building pads will have agriculture to the north across a state highway. However the minimum distance from a pad to this agriculture will be 200 feet and the average distance of the building pads will be 216 feet. There will be 6 building pads adjacent to agriculture to the west. In this case the minimum distance from a building pad to agriculture will be 86 feet with the average distance of these building pads being 95.8 feet. Finally, there will be 5 building pads adjacent to agriculture to the east. In this case the minimum distance from a building pad to agriculture will be 50 feet with the average distance of these building pads being 134.2 feet. Thus there will be ample separation of the development on this property with the nearest agricultural use.*

d. *The General Plan Category for the subject property as well as land to the land to both the east and west of the subject property is shown as "County Town". Additionally, the General Plan Designation of the property to the west permits one acre densities when the average slope is under 15% (which it appears to be)and the General Plan Designation on the properties to the east permit a density of 7.3 dwelling units per acre. Thus even though these properties have not developed to date at these densities, it is the plan of San Diego County that there be urban or semi-urban densities in the future on both the east and west of the subject property.*

e. *The San Diego County Board of Supervisors, on February12, 2003, amended the San Diego County Code of Regulatory Ordinances to require purchasers to be notified in writing that agricultural uses may exist nearby on property that the buyer is purchasing. The buyer must acknowledge by signature that such agricultural uses are likely to be nearby that may expose the buyer to certain irritations and inconveniences.*

Thus due to the number of existing parcels already in the range of what would be permitted by the density requested, the continued agricultural operations on the subject property, and the requirement that each perspective owner must sign a statement that they are aware of new agricultural operations, it is the conclusion that there will be no adverse impacts to agriculture in the surrounding area.

7. This project, in conjunction with other existing and proposed projects, would have an impact to agriculture that is cumulative considerable pursuant to the State CEQA Guidelines.

   The parcels are sized so they are consistent with the development as planned by the General Plan and zoning. They are also consistent with other lots in the cumulative study area.

   In terms of the principal farmlands found in the cumulative study area, the 5 selected projects meeting the parameters of this study described above will impact only 4.65% of the principal farmlands found in the cumulative study area.

   In terms of cumulative effect to San Diego County, the 5 selected projects meeting the parameters of this study amounts to a cumulative total of 169.49 acres. This amounts to a total of .22% of the Principal Farmlands in San Diego County. The subject property will not add to this cumulative total.

   Considering that 44% of the site will be available for agriculture after development, and the fact that the overall agricultural acreage in San Diego County increased 6,742 acres from 2004 to 2005, there will not be a cumulatively considerable impact to agricultural resources to San Diego County as a result of the development of the subject project.

V. FIGURES

VI. STATEMENT OF QUALIFICATIONS

The following participated in this study:

James Chagala—Principal Planner

Education: B.A. in Sociology
M.S. in Urban Geography
Ph.D. in Urban Geography

Experience: 31 years as a professional planner
2 years Regional Planner with the East-West Gateway Coordinating Council
26 years with Department of Planning and Land Use
5 years as Chief of the Long Range Planning Division
10 years as Chief of the Current Planning Division
12 years as staff to the County Planning Commission
8 years operating a private planning consultant practice

14 years as Adjunct Professor at San Diego State University
4 years as Adjunct Professor at California State University at San Marcos

Placed on the San Diego County Environmental Consultant List in the field of Agriculture on November 14, 2001.

Eric Chagala: Planning Technician
6.0 years as Planning Technician for a private planning consulting firm.

STATEMENT OF QUALIFICATIONS

The following participated in this study:

James Chagala—Principal Planner

Education: B.A. in Sociology
M.S. in Urban Geography
Ph.D. in urban Geography

Experience: 33 years as a professional planner
2 years with the East-West Gateway Coordinating Council
26 years with the San Diego County Department of Planning and Land Use
5 years as Chief of the Long Range Planning Division
10 years as Chief of the Current Planning Division
12 years as staff to the County Planning Commission
9 years operating a private planning consultant practice

15 years as Adjunct professor at San Diego State University
4 years as Adjunct professor at California State University at San Marcos

Placed on the San Diego County Environmental Consultant List in the field of Agriculture in March of 2007.

Jerry Chagala — Planning Technician
7 years as Planning Technician for a private planning consulting firm.

Eric Chagala — Planning Technician
7 years as Planning Technician for a private planning consulting firm.

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Vegetation
Topography
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